

Message

From: Yu-Lien Chu [Yu-Lien.Chu@erg.com]
Sent: 9/8/2014 10:18:08 PM
To: GLASS, GEOFFREY [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ee3c5cd15504e5aa8660fcf60d2e04d-GGLASS]
CC: Mae Thomas [Mae.Thomas@erg.com]; Raju Bisht [rbisht@navajo-nsn.gov]; tbbegay@navajo-nsn.gov; BECKHAM, LISA [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=75a0012699094cf59508bb04e90b393c-LBECKHAM]
Subject: RE: Draft Permit for Review - FCPP

Hi Geoffrey,

Thank you for the comments. We'll address the concerns related to CAM requirements and permit modifications. Please let us know what you find out about if we should include the "affirmative defense provisions" in the draft permit.

Yu-Lien
Yu-Lien Chu
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From: GLASS, GEOFFREY <GLASS.GEOFFREY@EPA.GOV>
Sent: Friday, September 05, 2014 6:02 PM
To: Yu-Lien Chu
Cc: Mae Thomas; Raju Bisht; tbbegay@navajo-nsn.gov; BECKHAM, LISA
Subject: RE: Draft Permit for Review - FCPP

Yu-Lien:

Thanks for the chance to take a look at the pre-draft permit. I have a few concerns and suggestions.

First, please coordinate with Lisa Beckham (Cc'd) on issues related to the PSD permit and the limited use boiler. She has been involved with both projects.

Second, the facility needs to evaluate CAM for the 2011 PM limit. The 2007 CAM plan may not be sufficient.

Third, the SoB states that SO₂ and NO_x limits for the boilers are exempt from CAM because CEMS are required. This is an oversimplification. According to 40 CFR 64.2(b)(1)(vi), emission limits are exempt from CAM if a part 71 permit specifies a continuous compliance determination method. A continuous compliance determination method, according to 40 CFR 64.1, provides data either in the units of the standard or correlated directly with the compliance limit. A CEMS measures concentrations in ppm, but some of the limits are in lb/MMBtu or lbs/hr. Further analysis is required to determine whether the CEMS constitute a continuous compliance determination method as defined in 40 CFR 64.1.

Fourth, Permit Condition II.A.6.c includes affirmative defense provisions. Affirmative defense provisions have been found indefensible in recent court decisions. I will contact the Office of Regional Council to discuss whether to include these provisions or to add some discussion to the SoB.

Fifth, there are some changes in the permit that would be considered to be permit modifications. Because the public noticing provisions are the same for an initial permit, a renewal, and a significant

modification, this is acceptable, but it would be clearer and would more closely match the intentions of the title V permitting program if there was a section in the SoB that clearly described the proposed modifications.

I would be happy to speak with you to discuss any of these issues.

Thank you. I will be taking a look at the NGS pre-draft permit next.

Geoffrey L. Glass
Environmental Engineer
Air Permits Office, EPA Region 9
415.972.3498

From: Yu-Lien Chu [mailto:Yu-Lien.Chu@erg.com]
Sent: Wednesday, August 20, 2014 2:51 PM
To: tbbegay@navajo-nsn.gov
Cc: Mae Thomas; Raju Bisht; GLASS, GEOFFREY
Subject: Draft Permit for Review - FCPP

Hi Tennille,

Attached is the draft TV permit renewal package for FCPP for your review. The requirements for NESHAP, Subpart UUUUU are included as Attachment C to the permit. As you indicated earlier, NNEPA and US EPA will need 3 weeks to review the draft. Therefore, please provide your comments on the draft by 9/12/14 (Fri).

Please note that this draft permit package does not include the following documents:

1. Attachment A to the Permit - Revised Dust Control Plan
- The revised plan will remove the any reference to boilers B1 through B3. The source plans to submit the revised plan sometime next week.
2. Attachment B to the Permit - Acid Rain Permit Renewal
- EPA Region 9 stated that they will issue the acid rain permit at the same time when the TV renewal permit is issued.

In addition, the source is working on a letter to request revising the operating limit for the auxiliary boiler from 876 hrs/yr to 10% annual capacity. The source stated they will submit this letter soon.

In the draft permit/sob, I put some placeholder languages for the pending documents. FCPP does plan to submit the above missing documents before the draft permit is ready for public notice. Please feel free to contact me for any questions about the draft permit package. Thank you.

Yu-Lien
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